

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA

In re:

\*

\* Chapter 13

\*

Willis Edwin Woody

\* Case No. 07-70889

Martha G. Woody

**MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS**

COME NOW the above-mentioned Debtors, by and through their attorney, and file this Motion and show the Court as follows:

1.

On September 18, 2007, Debtors filed a Chapter 13 Bankruptcy.

2.

Debtors own Land and a Mobile Home located in Berrien County; Citizens Bank., holds a valid mortgage on the Land and Mobile Home.

3.

Debtors have a sales contract to sell the Land and Mobile Home for \$23,000.00.

WHEREFORE, Debtors pray to the Court that:

- (1) Debtors be allowed to sell said property Free and Clear of Liens;
- (2) That the Lien of Citizens Bank be paid full at amount of debt;
- (3) The Debtors be allowed to keep proceeds to extent of exemptions.
- (4) Any such other and further relief as the Court deems just and proper.

/s/ William Woodall

William Woodall, Attorney for Debtors

1003 N. Patterson St.  
P.O. Box 3335  
Valdosta, GA 31604-3335  
(229) 247-1211  
Georgia Bar No. 775043

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA**

In re:

Willie Edwin Woody  
Martha G. Woody  
Debtors.

\* Chapter 13  
\*  
\* Case No. 07-70889  
\*  
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**NOTICE**

The Debtor(s) in the above captioned case having filed a Motion to Sell Property Free and Clear of all Liens with the Court.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)**

If you do not want the court to grant the Motion to Sell Property Free and Clear of all Liens or if you want the Court to consider your views on the Motion to Sell Property Free and Clear of all Liens, then you or your attorney must file with the Court a written request to the United States Bankruptcy Court for the Middle District of Georgia P.O. Box 2147 Columbus, GA 31902 (706) 649-7837 for a hearing on or before January 8, 2010 (the twentieth (20th) day after the date of this notice) and must serve a copy of said objection upon the attorney for the Debtor(s), and a copy upon the Trustee.

If you mail your request to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

Any request for a hearing must also be mailed to the moving party and upon all other persons indicated on the certificate of service attached to this pleading.

If you or your Attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Application and may enter an order granting that relief.

If any objections are filed, a hearing will be held on January 27<sup>th</sup>, 2010 at 8:30 a.m. in the United States Courthouse and Post Office Building, N. Patterson Street Valdosta, GA 31601.

**CERTIFICATE OF SERVICE**

I certify that I have, this 15<sup>th</sup> day of December, 2009, served a copy of the foregoing Notice and Motion to Sell Property Free and Clear of all Liens on Kristin Hurst, Chapter 13 Trustee, P.O. Box 1907, Columbus, GA 31902-1907; on Willis & Martha Woody 189 Woody Farm Road Nashville, GA 31639 and on each and every creditor listed on the attached mailing matrix by depositing the same in the U.S. Mail in a properly addressed envelope with first class postage affixed thereon to insure delivery.

/s/ William Woodall  
William Woodall, Attorney for Debtors

1003 N. Patterson St.  
P.O. Box 3335  
Valdosta, GA 31604-3335  
(229) 247-1211  
Georgia Bar No. 775043

Label Matrix for local noticing  
113G-7  
Case 07-70889  
Middle District of Georgia  
Valdosta  
Tue Dec 15 15:29:22 EST 2009

The Citizens Bank  
c/o W. Cavan Perry  
Studstill & Perry, LLP  
P.O. Box 647  
Nashville, TN 31639-0647

CBV Collections  
P.O. Box 867  
1515 N. Ashley St. , Ste. N  
Valdosta, GA 31602-3371

Citizens Bank  
c/o John E. Dalton, Jr.  
P.O. Box 1807  
Valdosta, GA 31603-1807

Dr. Edward J. Fricker  
3207 Country Club Drive  
Valdosta, GA 31605-1029

Farmers Furniture-Nashville  
Attn: Corp. Credit  
P.O. Box 1140  
Dublin, GA 31040-1140

LVNV Funding LLC its successors and assigns  
assignee of CitiFinancial  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Personal Finance Service  
P.O. Box 666  
203 E McPherson Ave  
Nashville, Ga 31639-2249

Rebecca Browning and  
William Martin Browning  
Route 1, Box 2195  
Naylor, Georgia 31641

The Citizens Bank  
c/o W. Cavan Perry  
Studstill & Perry, LLP  
P.O. Box 647  
Nashville, GA 31639-0647

Farmers Furniture  
ATTN CORPORATE CREDIT  
PO BOX 1140  
DUBLIN, GA 31040-1140

(p)W S BADCOCK  
P O BOX 232  
MULBERRY FL  
33860-0232

Citifinancial  
111 B Old Quitman Road  
Adel, GA 31620-5173

Credit Bureau Assoc. of Tifton  
321 Main St.  
Tifton, GA 31794-4897

Farmers Furniture  
Attn; Corp. Credit  
P.O. Box 1140  
Dublin,GA 31040-1140

First Franklin  
708 Tifton Road  
Nashville, GA 31639-3712

Nashville Credit Union  
902 S. Davis St.  
Nashville, GA 31639-2602

Preferred Credit  
P O Box 1679  
Saint Cloud, MN 56302-1679

Roundup Funding, LLC  
MS 550  
PO Box 91121  
Seattle, WA 98111-9221

TitleMax Corporate Office  
15 Bull Street  
Suite 200  
Savannah, GA 31401-2686

First Franklin Financial Corp.  
c/o David M. Wolfson, P.C.  
1010 Williams Street  
Valdosta, GA 31601-4039

7  
901 Front Avenue  
P.O. Box 2147  
Columbus, GA 31902-2147

Citizens Bank  
301 South Davis Street  
Nashville, GA 31639-2117

Direct Merchants Bank  
c/o Frederick J. Hanna Associates  
1427 Roswell Road  
Marietta, GA 30062-3668

Farmers Furniture  
P.O. Box 1140  
Dublin, GA 31040-1140

First Franklin Financial Corp.  
P.O. Box 67  
Nashville, Georgia 31639-0067

Personal Finance  
203 East McPherson Street  
Nashville, GA 31639-2249

Rebecca Browning  
115 Woody Farm Road  
Nashville, GA 31639-9050

South Georgia Medical Center  
P.O. Box 0070  
Valdosta, GA 31603-0070

Martha G. Woody  
189 Woody Farm Road  
Nashville, GA 31639-9050

Trustee Kristin Hurst	William O. Woodall	Willis Edwin Woody
P.O. Box 1907	Woodall and Woodall	189 Woody Farm Road
Columbus, GA 31902-1907	P.O. Box 3335	Nashville, GA 31639-9050
	1003 Patterson Street	
	Valdosta, GA 31601-3918	

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

W. S. Badcock, Corp.	(d)Badcock	(d)W. S. Badcock, Corp.
P. O. Box 232	P.O. Box 497	P. O. Box 232
Mulberry, FL 33860	Mulberry, FL 33860	Mulberry, FL. 33860

End of Label Matrix	
Mailable recipients	32
Bypassed recipients	0
Total	32